



*Mailed
6-19-97*

Air Pollution Control Board

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Air Pollution Control District

R. J. Sommerville Director

COMPLIANCE ADVISORY

NOTICE OF AMENDMENTS TO RULE 67.9 AEROSPACE COATING OPERATIONS

On April 30, 1997, the Air Pollution Control District adopted amendments to Rule 67.9, an existing rule that regulates emissions of volatile organic compounds (VOCs) from aerospace coating (painting) and cleanup operations. A number of changes were made to the allowable VOC content of specific categories of coatings. Several minor changes were also made to clarify the rule.

The amended rule does the following:

Exemptions

Requires monthly records, instead of yearly records, to claim certain exemptions from the rule. Clarifies the term "year" to mean a consecutive 12-month period.

Exempts from certain requirements of the rule, maskant application dip tank operations when 20 gallons or less of coatings are used in each consecutive 12-month period or when aqueous based coatings with a volatile organic compound (VOC) content of 10% by weight or less are used.

Exempts coating operations using less than 200 gallons of non-compliant coatings in each consecutive 12-month period from the VOC limits, application method requirements, surface preparation requirements, equipment cleaning requirements and some recordkeeping requirements.

Definitions

Adds a new definition for multi-stage maskant systems.

Adds new definitions for Type I and Type II chemical milling maskants, bonding maskants and specialized function coatings.

Deletes the definition of exempt compounds and refers instead to the updated definition in Rule 2.

Amends other definitions for clarification.

VOC Limits

Increases VOC content limits for adhesive bonding primers, rain erosion resistant coatings and fuel tank coatings.

Sets new VOC content limits for Type I and Type II chemical milling maskants, bonding maskants and multi-stage maskants.

Establishes a method for determining compliance with the VOC limits for multi-stage maskants.

**Surface
Preparation and
Equipment
Cleaning**

Adds an option for using high boiling point materials for surface preparation and equipment cleaning operations.

Adds alternative methods for cleaning coating application equipment.

**Maskant Dip
Coating
Application
Equipment**

Specifies new requirements for dip coating equipment for non-aqueous Type I chemical milling maskants.

**Recordkeeping
Requirements**

Clarifies existing requirements. Adds a requirement to maintain daily usage records of all non-compliant coatings, thinners and other VOC containing materials used.

Test Methods

Updates and adds new test methods for determining compliance with the rule.

For more information, please call the District's Compliance Division at (619) 694-3340. For all permit holders, a copy of Rule 67.9 has been enclosed. If you are not a permit holder and would like a copy of the amended rule, please call (619) 694-3307 to request a copy.

GMH:ls
5/29/97